

Voytilla, Marykay

From: Greaves, Natasha
Sent: Thursday, May 15, 2014 8:01 AM
To: Filippini, Mark
Cc: Maxwell, Grady; Boykin, Michael; Voytilla, Marykay; Hamlin, Tim; Clark, Johnny; Chu, Ed
Subject: RE: Links and Info on Water Sampling for Lead

Mark,

Thanks for clarifying. HQ may want to update that website! The "What does the Data Mean" section is very misleading, especially the reference to an old MCL of 20 ppb.

Thanks,

Natasha Greaves | AFGE Local 1110 President
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From: Filippini, Mark
Sent: Thursday, May 15, 2014 7:52 AM
To: Greaves, Natasha
Cc: Maxwell, Grady; Boykin, Michael; Voytilla, Marykay; Hamlin, Tim; Clark, Johnny; Chu, Ed
Subject: RE: Links and Info on Water Sampling for Lead

Natasha,

Thanks for the message. The guidance document provided on the web is dated to about 1994 (I believe). Back then, the action level was 20 ppb. It has since been lowered to 15 ppb. I tried to do a Google search to determine when they lowered the MCL, but could not find it. We can check with OWW to confirm when that happened, but the 15 ppb is the real MCL and applies to every drinking water source covered under EPA regulations. Sorry for that confusion.

Mark

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From: Greaves, Natasha
Sent: Thursday, May 15, 2014 7:24 AM
To: Filippini, Mark
Cc: Maxwell, Grady; Boykin, Michael; Voytilla, Marykay; Hamlin, Tim; Clark, Johnny; Chu, Ed
Subject: RE: Links and Info on Water Sampling for Lead

Mark,

Thanks for providing me with the links. I have a few clarifying questions. Last week we identified a 15 ppb action level and did not engage in any discussions about another action level.

Based on the information from the first link you provided, it seems as if 15 ppb is the action level for schools on a public water system. What is confusing me is a later reference to 20 ppb as being a level that requires further sampling and an action level for lead in drinking water. I assume that the 15 ppb is more stringent because of the sensitive population at schools. But the latter statement seems to imply that in a "non-school" setting 20 ppb may be the action level.

And if we have two "action levels", what is the process for determining the action level for EPA occupied floors? The day care or course would fall under the 15 ppb, but what about the rest of the building? Is it possible that the rest of the building would have an action level of 20 ppb? One scenario could be that the level on the EPA occupied floors would have a limit of up to 20 ppb and still assume occupancy. And, any efforts to get to below 20 ppb, perhaps to 15 ppb, would be a decision that the Region would have to make. Currently, we have discussed EPA taking action for sources that are close to 15 ppb.

Any help in understanding the two sections below and what it means for a mixed use building (daycare and offices) will be greatly appreciated. Perhaps the region made a decision that the union is not aware of to be most conservative and use 15 ppb as the action level for EPA occupied space. If that is the case, another point to consider is the action level that would prohibit occupancy of space. Is that 15 or 20 ppb?

Know the school's source of water:

If the school is a public water system, EPA's action level is 15 parts per billion (ppb) for lead. For schools that receive water from a public water system, obtain a copy of the most current lead test results from the water system.* Water characteristics and test results can help you interpret your sampling results. You can also ask if the water is optimized for corrosion control and if the system has a corrosion control permit. This information will assist you in determining the appropriate remedies to any lead problems identified during the sampling phase.

Sample results:

First draw samples of 250 ml will test whether the fixture and immediate piping is contributing lead. If sample results are greater than 20 ppb, conduct follow up sampling, such as a flush sample, to help pinpoint the source of the lead.

What do the data mean?

EPA's recommended action level for lead in drinking water is 20 parts per billion (ppb), which is equivalent to micrograms per liter (µg/L).

Thanks,

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From: Filippini, Mark
Sent: Wednesday, May 14, 2014 4:08 PM
To: Greaves, Natasha; Boykin, Michael
Cc: Maxwell, Grady
Subject: Links and Info on Water Sampling for Lead

Natasha,

Per our discussion this afternoon, attached is an excerpt from the below EPA web page on sampling in schools and day care centers. Also below is a link to a larger and older pdf EPA document on sampling in nursery schools and day care centers.

Let me know if you have any questions.

Thanks
Mark

<http://water.epa.gov/drink/info/lead/testing.cfm>

http://www.epa.gov/ogwdw/lcmmr/pdfs/guidance_lcmmr_sampling_nursery_day_care.pdf

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